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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
DANIEL JAMES HARRIS,  
Defendant.

) CASE NOS. 4:23-CR-00268 JSW &  
4:24-CR-00502 JSW  
) **UNITED STATES' SENTENCING**  
) **MEMORANDUM AND § 5K1.1 MOTION**  
) **BASED UPON SUBSTANTIAL ASSISTANCE**  
) **TO AUTHORITIES**

1     **I. INTRODUCTION**

2         Defendant Daniel Harris, a police officer with the Antioch Police Department (“APD”), began  
3 purchasing illegal anabolic steroids for his own personal use around 2019. He then began selling and  
4 distributing these Schedule III controlled substances to numerous other law enforcement officers at APD  
5 and neighboring law enforcement agencies. Among others, Harris sold illegal anabolic steroids to  
6 fellow APD officer Devon Wenger, and also agreed with Wenger to distribute them to Wenger’s friend  
7 B.M. Harris’ prolific sale and distribution of illegal anabolic steroids continued through March 2022 as  
8 he was in the process of moving from California to Texas, only coming to a halt after the FBI executed  
9 search warrants that located and seized troves of illegal anabolic steroids from a postal package destined  
10 for Harris (including steroids for Wenger’s friend), from Harris’ California residence, and from Harris’  
11 new residence in Weatherford, Texas.

12         The government’s investigation also revealed that Harris’ criminal activity while employed as an  
13 APD officer was not limited to the purchase and distribution of illegal anabolic steroids: he further  
14 committed bank fraud by falsifying information in his application for a mortgage to purchase his Texas  
15 residence.

16         Harris’ crimes were particularly serious given Harris’ role as a law enforcement officer sworn to  
17 uphold the law. However, following his indictment and arrest, Harris took responsibility for his actions  
18 and pleaded guilty to all of these crimes, agreed to meet with the government and cooperate, and  
19 ultimately testified before the jury as to his and Wenger’s conduct involving the distribution of illegal  
20 anabolic steroids.

21         Based on the nature and circumstances of the serious offenses, the defendant’s history and  
22 characteristics (including his role as a sworn police officer), the need for deterrence, and the need to  
23 avoid unwarranted sentence disparities given the sentences already imposed by this Court, as well as the  
24 government’s motion for the equivalent of a three-level downward departure pursuant to § 5K1.1, the  
25 government recommends that the Court impose a sentence of twelve months and a day of custody,  
26 followed by three years of supervised release, and 100 hours of community service. This proposed  
27 sentence is sufficient, but not greater than necessary, to achieve the goals set forth in 18 U.S.C.  
28 § 3553(a)(2).

1       **II. BACKGROUND**

2           **A. Factual Background**

3           *CR 24-00268-001 JSW*

4           Daniel James Harris was formerly employed as a police officer with the Antioch Police  
 5 Department. PSR ¶ 10. Beginning no later than in or about November 2019 and continuing through in  
 6 or about March 2022, and while employed with the Antioch Police Department, Harris possessed with  
 7 intent to distribute, and conspired with other persons to distribute, anabolic steroids and other Schedule  
 8 III controlled substances. PSR ¶ 10. Harris knowingly obtained and possessed anabolic steroids for his  
 9 own personal use as a competitive bodybuilder. PSR ¶ 10. He also possessed anabolic steroids to  
 10 distribute to other persons in exchange for payment using electronic payment services such as Venmo  
 11 and Zelle. PSR ¶ 10.

12           Harris purchased anabolic steroids and other Schedule III controlled substances from a source  
 13 located in Florida, who went by the moniker “J.M.” PSR ¶ 11. J.M. labeled the anabolic steroids  
 14 “Trueshot Pharmaceuticals,” which was not a legitimate company. PSR ¶ 11. Harris sold and  
 15 distributed anabolic steroids on many occasions to other law enforcement officers, including Devon  
 16 Wenger and Timothy Manly Williams at the Antioch Police Department, and those at other police  
 17 departments. PSR ¶ 11.

18           Harris knew Wenger because they both worked at the Antioch Police Department, and because  
 19 Harris purchased his home in Discovery Bay, California from Wenger. PSR ¶ 12. Prior to March 2022,  
 20 Harris sold Wenger multiple vials of anabolic steroids, including testosterone. PSR ¶ 12. In February  
 21 2022, Harris provided Wenger with testosterone and helped Wenger administer the first dose through an  
 22 intramuscular injection. PSR ¶ 12.

23           Shortly afterwards, Wenger put Harris in touch with his friend, B.M., so that B.M. could  
 24 purchase steroids from Harris. PSR ¶ 13. B.M. contacted Harris to talk about fitness and steroids. PSR  
 25 ¶ 13. Harris then agreed with Wenger to get B.M. a bottle of testosterone. PSR ¶ 13.

26           Harris subsequently ordered anabolic steroids from his source. PSR ¶ 14. Harris admitted he  
 27 intended to use some of the anabolic steroids himself and distribute the other steroids to Wenger and  
 28 B.M. PSR ¶ 14. On March 2, 2022, Wenger contacted Harris and asked if he could pick up B.M.’s

1 steroids. PSR ¶ 14. However, because Harris still had not received the package from his source, he  
 2 followed up via email. PSR ¶ 14. The source explained that the package was “taking longer than  
 3 expected,” and provided Harris with the tracking number. PSR ¶ 14.

4 On March 9, 2022, Wenger again contacted Harris and asked if he could pick up B.M.’s steroids.  
 5 PSR ¶ 15. Harris responded that the package was still late and sent Wenger the tracking number. PSR  
 6 ¶ 15. Wenger then asked Harris if he could give B.M. one of his (Wenger’s) personal bottles of steroids,  
 7 and then get his supply replenished when the shipment finally arrived. PSR ¶ 15.

8 However, the package never arrived because it was seized by the United States Postal Service  
 9 (USPS). PSR ¶ 16. The seized priority mail package was addressed to a “Danny Moore” at a residence  
 10 in Discovery Bay, California. PSR ¶ 16. “Danny Moore” was Harris’ alias, and the address was Harris’  
 11 home. PSR ¶ 16. The seized USPS package contained two smaller boxes: one box contained various  
 12 prescription-type medications, all labeled as having been manufactured by “True Shot Pharmaceuticals.”  
 13 PSR ¶ 16. The second box contained glass vials with three different color caps. PSR ¶ 16.

14 Lab reports from the Drug Enforcement Administration revealed the package contained 41  
 15 capsules of oxymetholone; 124 mL of Testosterone Enanthate; 28.2 mL of Testosterone Propionate;  
 16 56.1 mL of Trenbolone acetate; 60 mL of Nandrolone Decanoate; 43 mL of Trenbolone Enanthate; and  
 17 a total of 16.6 mL of miscellaneous steroids. PSR ¶ 17. Harris admitted that the USPS package  
 18 contained (1) one sealed black packet with the label “Trueshot Pharmaceuticals; Anadrol-50mg; QTY:  
 19 50; Each Capsule Contains: 50mg Oxymetholone,” containing at least 2 grams of Oxymetholone; (2)  
 20 multiple glass vials containing a clear liquid and a gray top, with a label “Trueshot Pharmaceuticals;  
 21 Test E 300mg; Sterile 10ml multi-dose vial. For intramuscular use only; Testosterone Enanthate” or  
 22 “Testosterone Cypionate,” containing at least 110 grams of Testosterone Enanthate; (3) multiple glass  
 23 vials containing a clear liquid and a purple top, with a label “Trueshot Pharmaceuticals; Test P 100;  
 24 Sterile 10ml multi-dose vial. For intramuscular use only; Testosterone Propionate,” containing at least  
 25 25 grams of Testosterone Propionate; (4) and multiple glass vials containing a yellow liquid and a red  
 26 top, with a label “Trueshot Pharmaceuticals; Tren A 100; Sterile 10ml multi-dose vial. For intramuscular  
 27 use only; Trenbolone Acetate,” containing at least 55 grams of Trenbolone Acetate. PSR ¶ 17. In total,  
 28

1 this amount of steroids (192 grams) equates to 7,680 units of Schedule III controlled substances using  
2 the conversion instructions outlined in USSG § 2D1.1, comment (n.F). PSR ¶ 17.

3 On or about March 23, 2022, Harris possessed anabolic steroids and other controlled substances  
4 at his home in Discovery Bay, California, including: at least 60 grams of Trenbolone Enanthate; at least  
5 10 grams of Trenbolone Acetate; at least 25 grams of Testosterone Acetate; at least 15 grams of  
6 Testosterone Propionate; at least 25 grams of Testosterone Cypionate; at least 50 grams of Nandrolone  
7 Decanoate; at least 25 grams of Nandrolone Phenylpropionate; at least 50 grams of Drostanolone  
8 Enanthate; at least 70 grams of Drostanolone Propionate; at least 65 grams of Boldenon Undecylenate;  
9 at least 15 grams of Oxandrolone; at least 10 grams of Methandienone; at least 5 grams of  
10 Oxymetholone; and at least 5 grams of Stanozolol. PSR ¶ 18. On the same date, Harris also possessed  
11 at least 15 grams of Testosterone Cypionate at his home in Weatherford, Texas. PSR ¶ 18. These  
12 amounts of steroids equate to 17,800 units of Schedule III controlled substances using the conversion  
13 instructions outlined in USSG §2D1.1, comment. (n.F). PSR ¶ 18.

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15 In February 2022, Harris knowingly supplied inaccurate information to a financial institution in  
16 connection with his application for a mortgage. PSR ¶ 19. During this time, Harris applied for, and  
17 subsequently received, a \$494,000 loan from Mortgage Financial Services LLC with the intent to  
18 defraud the financial institution to purchase a residence on Coldwater Creek Lane in Weatherford,  
19 Texas. PSR ¶ 19.

20 Harris provided false information in and omitted material facts from his application. PSR ¶ 20.  
21 Specifically, in support of his application, he included at least three falsified documents. PSR ¶ 20.  
22 First, Harris falsified and attached a summary of disability benefits purportedly issued by the Standard  
23 Insurance Company. PSR ¶ 20. Second, Harris falsified and attached a tax disclosure purportedly  
24 issued by the Standard Insurance Company. PSR ¶ 20. Third, Harris falsified and attached a rental  
25 agreement purporting to show that a friend, G.S., had rented his home in Discovery Bay, California for  
26 \$3,400 per month. PSR ¶ 20. Although Harris and G.S. had discussed that possibility, G.S. had not in  
27 fact rented the property. PSR ¶ 20. Harris created the signature on the agreement in G.S.'s name and  
28 Harris did not actually receive any rental income from G.S. PSR ¶ 20.

1           **B. Procedural History**

2           Harris was charged on August 16, 2023, in a four-count Indictment with violations of 21 U.S.C.  
 3       §§ 846, 841(a)(1) and (b)(1)(E)(i) – Conspiracy to Distribute and Possess with Intent to Distribute  
 4       Anabolic Steroids (Count One); 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(E)(i) – Attempted Possession  
 5       with Intent to Distribute Anabolic Steroids (Count Two); 21 U.S.C. §§ 841(a)(1) and (b)(1)(E)(i) –  
 6       Possession with Intent to Distribute Anabolic Steroids (Count Three). In the same Indictment, Devon  
 7       Wenger was charged with violations of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(E)(i) – Conspiracy to  
 8       Distribute and Possess with Intent to Distribute Anabolic Steroids (Count One) and 18 U.S.C. § 1519 –  
 9       Destruction, Alteration, and Falsification of Records in Federal Investigations (Count Four).

10          On September 13, 2024, Harris was charged by Information with violating 18 U.S.C. § 1344(1),  
 11       (2) – Bank Fraud.

12          On September 17, 2024, Harris pleaded guilty to Counts One through Three of the Indictment,  
 13       and pleaded guilty to the Information’s sole charge. Sentencing is currently set for January 13, 2026, at  
 14       1:00 p.m., before the Honorable Jeffrey S. White, Senior United States District Judge.

15           **C. Criminal History**

16          Harris has no criminal convictions resulting in any Criminal History Points, placing him in  
 17       Criminal History Category I. *See* PSR ¶¶ 49–55.

18           **D. Guidelines Calculation**

19          The government agrees with the Sentencing Guidelines calculation of the United States  
 20       Probation Office, prior to any motion by the government under § 5K1.1. PSR ¶¶ 28-47.

21          In sum, the base offense level of Count Group 1 is 16, pursuant to U.S.S.G. § 2D1.1(a)(5),  
 22       (c)(12). The base offense level of Count Group 2 is 7, pursuant to U.S.S.G. § 2B1.1(a)(1), and a twelve-  
 23       level enhancement pursuant to U.S.S.G. § 2B1.1(b)(1)(G) applies because the calculated loss amount  
 24       was more than \$250,000 and less than \$550,000. Following a multiple count adjustment, the Combined  
 25       Offense Level is 21. A three-level reduction pursuant to U.S.S.G. § 3E1.1 applies based on the  
 26       defendant’s Acceptance of Responsibility, and another two-level reduction pursuant to  
 27       U.S.S.G. §4C1.1(a) and (b) applies because the defendant is a zero-point offender.

28          An offense level of 16 with a Criminal History Category I yields an advisory sentencing range of

1 **21 to 27 months of imprisonment. PSR ¶ 78.**

2 **E. Timeline of Convictions and Sentencings in the Related Antioch & Pittsburg Cases**

3 The status of sentencing of the defendants in these related cases is as follows:

- 4 • *Timothy Manly Williams – pleaded guilty on November 28, 2023 to falsification of records,*  
 5 *obstruction of official proceedings, and deprivation of rights under color of law; sentencing*  
 6 *pending;*
- 7 • Samantha Genoveva Peterson – pleaded guilty on January 9, 2024 to conspiracy to commit  
 8 wire fraud; sentenced to time served, 3 years of supervised release, 100 hours of community  
 9 service;
- 10 • Patrick James Berhan – pleaded guilty on March 26, 2024 to conspiracy to commit wire  
 11 fraud, wire fraud, and possession with intent to distribute anabolic steroids; sentenced to 30  
 12 months of custody, 2 years supervised release;
- 13 • Ernesto Mejia-Orozco – pleaded guilty on June 11, 2024 to conspiracy to commit wire fraud  
 14 and wire fraud; sentenced to 3 months of custody, 3 years of supervised release, 100 hours of  
 15 community service;
- 16 • Brauli Jalapa Rodriguez – pleaded guilty on June 25, 2024 to conspiracy to commit wire  
 17 fraud and wire fraud; sentenced to 3 months of custody, 3 years supervised release, 100 hours  
 18 of community service;
- 19 • Amanda Carmella Theodosy a/k/a Nash – pleaded guilty on July 30, 2024 to conspiracy to  
 20 commit wire fraud and wire fraud; sentenced to 3 months of custody, 3 years supervised  
 21 release, 50 hours of community service;
- 22 • Morteza Amiri – convicted at trial on August 8, 2024 for conspiracy to commit wire fraud  
 23 and wire fraud, and convicted at trial on March 14, 2025 for deprivation of rights under color  
 24 of law and falsification of records; sentenced to 84 months of custody, 3 years supervised  
 25 release;
- 26 • *Daniel James Harris – pleaded guilty on September 17, 2024 to conspiracy to distribute and*  
 27 *possess with intent to distribute anabolic steroids, attempt and possession with intent to*  
 28 *distribute anabolic steroids, and bank fraud; sentencing pending;*

- 1     • Eric Allen Rombough – pleaded guilty on January 14, 2025 to conspiracy against rights and  
2       deprivation of rights under color of law; sentencing pending;
- 3     • Devon Christopher Wenger – convicted at trial on April 30, 2025 for conspiracy to distribute  
4       and possess with intent to distribute anabolic steroids and destruction of records, and  
5       convicted at trial on September 18, 2025 for conspiracy against rights; sentenced to 90  
6       months of custody, 3 years supervised release.

### 7     III. DISCUSSION

#### 8       A. Applicable Law

9       The Court should impose a sentence sufficient, but not greater than necessary, to reflect the  
10      purposes of sentencing that Congress identified in 18 U.S.C. § 3553(a)(2). *United States v. Carty*, 520  
11      F.3d 984, 991 (9th Cir. 2008). The Court should begin the process of determining an appropriate  
12      sentence by calculating the correct sentencing range under the Guidelines. *Id.* After determining the  
13      appropriate Guidelines calculation, the Court should then evaluate the sentence for substantive  
14      reasonableness in light of the factors set out in Section 3553(a). *Carty*, 520 F.3d at 991–93.

15       Under 18 U.S.C. § 3553(a), in arriving at the appropriate sentence for the defendant, the Court  
16      should consider these factors applicable to this case, among others:

- 17           (1) the nature and circumstances of the offense and the history and  
18           characteristics of the defendant;
- 19           (2) the need for the sentence imposed to reflect the seriousness of the  
20           offense, to promote respect for the law, and to provide just  
21           punishment for the offense;
- 22           (3) the need for the sentence imposed to afford adequate deterrence to  
23           criminal conduct;
- 24           (4) the need to avoid unwarranted sentence disparities among  
25           defendants with similar records who have been found guilty of  
26           similar conduct; and
- 27           (5) the need to avoid unwarranted sentence disparities among  
28           defendants with similar records who have been found guilty of  
29           similar conduct.

30       Under U.S.S.G. § 5K1.1, upon motion of the government stating that the defendant has provided  
31      substantial assistance in the investigation or prosecution of another person who has committed an  
32      offense, a sentence that is below the otherwise applicable guideline range may be appropriate. The

1 appropriate reduction shall be determined by the court for reasons stated that may include, but are not  
 2 limited to, consideration of the following:

- 3       (1) the court's evaluation of the significance and usefulness of the  
         defendant's assistance, taking into consideration the government's  
         evaluation of the assistance rendered;
- 5       (2) the truthfulness, completeness, and reliability of any information or  
         testimony provided by the defendant;
- 7       (3) the nature and extent of the defendant's assistance;
- 8       (4) any injury suffered, or any danger or risk of injury to the defendant  
         or his family resulting from his assistance; and
- 9       (5) the timeliness of the defendant's assistance.

10      **B. Substantial Assistance to Authorities and Motion for Variance Under § 5K1.1**

11      The government moves the Court pursuant to § 5K1.1 for a variance that is the equivalent of a  
 12 three-level downward departure based on Harris' substantial assistance to authorities.<sup>1</sup>

13      Following the FBI's execution of search warrants of Harris' property, Harris demonstrated an  
 14 immediate interest in resolution. Harris first met with the government in October 2023, within about  
 15 two months of his indictment. He then met again with the government in July 2024, accepting  
 16 responsibility for the crimes he was charged with and additional crimes involving bank fraud. He  
 17 ultimately agreed to cooperate with the government and pleaded guilty to all charges in September 2024,  
 18 well in advance of the trial of fellow APD officer Devon Wenger at which he would testify.

19      Harris' testimony was significant. Although the other evidence against Wenger was

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21      <sup>1</sup> Although departures have been removed from the Sentencing Guidelines as of the 2025  
 22 amendments, including with respect to § 5K1.1, the government's motion is still made in the context of  
 23 a "departure" to implemented as a variance, given that the Guidelines describe the intent of the change  
 24 to actually be "outcome neutral." See U.S.S.G. § 1 ("The Commission sought to make these changes to  
     better align the requirements placed on the court and acknowledge the growing shift away from the use  
     of departures provided for within the Guidelines Manual in the wake of *Booker* and subsequent  
     decisions. **The Commission envisioned and framed this 2025 amendment to be outcome neutral.**  
 25 As such, the removal of departures from the Guidelines Manual does not reflect a determination by the  
     Commission that the rationale underlying the deleted departure provisions is no longer informative or  
     that a court should no longer consider such facts for purposes of determining the appropriate sentence.  
 26 **The removal of departures does not limit the information courts may consider in imposing a  
     sentence and it is the Commission's intent that judges who would have relied upon facts  
     previously identified as a basis for a departure will continue to have the authority to rely upon  
     such facts to impose a sentence outside of the applicable guideline range as a variance under 18  
     U.S.C. § 3553(a).**" (emphases added)).

1 straightforward—including documentary evidence seized from digital devices coupled with the actual  
2 anabolic steroids from the anticipated postal package, along with the live testimony of Wenger’s  
3 friend—Harris offered additional insight from the perspective of a police officer willing, unlike Wenger,  
4 to admit his errors. Harris’ testimony also corroborated each of these numerous sources of evidence and  
5 made clear that Wenger’s accusations and allegations to the contrary were completely unfounded.

6 Harris was also truthful. While it was evident during several of his meetings with the  
7 government that his interpretation of his own behavior at times differed from the government’s—such as  
8 in his insistence, repeated in the PSR, that he was concerned to help others—he nonetheless accepted  
9 full responsibility for his actions.

10 Following his agreement to cooperate, Harris also met with the government when he was asked  
11 to, flying from Texas to Oakland for one trial preparation meeting and attending another by  
12 videoconference. He testified at trial for approximately three hours.

13 Harris’ cooperation included some risk as well: as with any police officer who testifies against  
14 another, what Harris did was not easy. He made admissions about his own criminal conduct and that of  
15 a fellow officer on the stand, and his cooperation is now in the public record.

16 Based on Harris’ substantial assistance to authorities, as set forth above, the government moves  
17 this Court for a variance that is the equivalent of a three-level downward departure pursuant to § 5K1.1.  
18 This variance would result in an offense level of 13, which with a Criminal History Category I yields an  
19 advisory sentencing range of **12 to 18** months of imprisonment.

20 **C. Recommendation**

21 The government respectfully recommends that the Court impose a sentence of twelve months  
22 and a day of custody—at the low end of the post-variance Guidelines range—followed by three years of  
23 supervised release and 100 hours of community service, based upon a consideration of the Guidelines,  
24 18 U.S.C. § 3553(a), and § 5K1.1 factors.

25 Harris’ history and characteristics support the government’s recommended sentence. Like the  
26 other defendants in these related cases, Harris was a public servant sworn to uphold the rule of law when  
27 he broke it. Unlike some of the others charged, however, his crime was not committed under color of  
28 law, nor did he defraud his own police department. But his crimes were still serious: he used illegal

1 anabolic steroids while employed as a police officer, and he distributed these steroids to other officers he  
 2 knew would utilize those controlled substances in the line of duty. This behavior was not only illegal  
 3 but also highly irresponsible, given it is well known that the use of steroids can diminish impulse control  
 4 and increase hostility, aggression, and violent behaviors,<sup>2</sup> consequences that could only be even more  
 5 dangerous in a law enforcement context. And his outright forgery of documents to obtain his Texas  
 6 mortgage showed certain hypocrisy by a sworn officer whose role was to enforce the law against such  
 7 crimes.

8       The government's recommended sentence would also serve as general deterrence to others in  
 9 positions of public trust—particularly sworn police officers—from committing such crimes, and  
 10 especially acknowledge the risks associated with steroid abuse or other distribution of controlled  
 11 substances by those in positions of public trust. As with the other defendants in these related cases, this  
 12 Court's sentence should send a message to those who also may be tempted to commit such crimes.

13       The government's recommended sentence would also avoid sentencing disparities with  
 14 defendants who have been found guilty of similar conduct. To assist the Court's consideration of  
 15 sentencing parity, the government has, above, detailed for the Court all prior sentences in these related  
 16 cases. For instance, Patrick Berhan similarly pleaded guilty to violations involving the distribution of  
 17 anabolic steroids and fraud (a different scheme involving defrauding his employer), but he did not  
 18 cooperate with or provide any assistance to the government; he was sentenced to 30 months of  
 19 imprisonment.

20       The government also acknowledges that Harris' family history—including poverty, neglect, and  
 21 abuse that permeated his childhood—in some ways provides context for the poor choices he has made  
 22 with the offense conduct. As Harris notes in his attempt in the PSR to explain his crimes, “[m]y intent  
 23 was never malicious.” PSR ¶ 24. Of course, this is not the test of legality, but Harris’ difficult  
 24 childhood offers some insight into an inability to differentiate between what he calls the “letter” and  
 25 “spirit” of the law, and his misguided approach to “helping” people. *See* PSR ¶ 24. For this reason, the  
 26 government recommends a sentence at the low end of the post-variance Guidelines range.  
 27  
 28

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<sup>2</sup> See, e.g., <https://pmc.ncbi.nlm.nih.gov/articles/PMC8211877/>.

1 Finally, the government recommends that the Court order a three-year term of supervised release  
2 for Harris with the conditions recommended in the PSR, as well as with the same 100 hours of  
3 community service that this Court also required of other defendants including Peterson, Mejia-Orozco,  
4 and Jalapa Rodriguez. The expanded suspicionless search condition agreed to by the parties is  
5 appropriate to serve the interests of specific deterrence and rehabilitation given Harris' use of electronic  
6 devices in carrying out his crimes.

7 **IV. CONCLUSION**

8 For the foregoing reasons, the United States respectfully requests that the Court impose a  
9 sentence of twelve months and a day of imprisonment, followed by three years of supervised release  
10 with the agreed-upon expanded suspicionless search condition and other conditions recommended in the  
11 PSR, and 100 hours of community service.

12  
13 DATED: January 6, 2026

Respectfully submitted,

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15 United States Attorney

16 \_\_\_\_\_ /s/  
17 ERIC CHENG  
18 ALETHEA M. SARGENT  
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